

ORIGINAL

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

MAY 15 2000

In the Matter of	)	
	)	
1998 Biennial Regulatory Review – Streamlined	)	
Contributor Reporting Requirements Associated	)	CC Docket No. 98-171
With Administration of Telecommunications	)	
Relay Services, North American Numbering Plan,	)	
Local Number Portability, and Universal Service	)	
Support Mechanisms	)	
	)	

**SUPPLEMENTAL JOINT SUBMISSION OF PROGRAM ADMINISTRATORS  
REGARDING CONSOLIDATED DATA COLLECTION PROCEDURES  
AND COST ALLOCATION METHODOLOGY**

**INTRODUCTION**

On July 14, 1999, the Commission released a Report and Order in CC Docket No. 98-171 which streamlined the revenue reporting requirements for contributors who finance the shared costs of Local Number Portability, administration of the North American Numbering Plan (NANP), the interstate Telecommunications Relay Services Fund, and the federal Universal Service Fund. The changes were to take effect beginning with the submission of the FCC Form 499A on April 1, 2000.<sup>1</sup> In the Order, the Commission also directed the program administrators to develop efficient and effective procedures for collecting, validating, and distributing the centrally-filed contributor data among themselves, and to file with the Bureau, within 90 days after release of the Order, a summary of their proposed procedures for distributing the data from the worksheet.

<sup>1</sup> 1998 Biennial Regulatory Review Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Services, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms, *Report and Order* in CC Docket No. 98-171, FCC 99-175 (July 14, 1999).

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On October 12, 1999, the program administrators submitted a joint filing of proposed procedures and a mechanism for assigning the costs incurred by the data collection agent in the performance of those procedures.<sup>2</sup> The *Joint Submission*, while addressing the work functions to be performed by the Data Collection Agent (DCA), was silent on which entity should perform the work.

On February 3, 2000, the Commission adopted an Order designating NECA to perform the tasks associated with the April 2000 data collection, "as outlined in the joint submission of the administrators."<sup>3</sup> In that Order, the Commission also directed the administrators to file either jointly or severally proposed procedures for handling the consolidated worksheet for the September 2000 filing and for both the April and September filings in the years 2001 and 2002. The Commission further directed that any proposal(s) for future filings are to take into consideration the practical experiences of the April 1, 2000 filing and must demonstrate that they will provide not only low cost overall, but ease of filing for contributors and a high degree of effectiveness in compiling, validating, and distributing the contributor data.<sup>4</sup>

The program administrators, NeuStar, the Local Number Portability administrator, NBANC, the North American Numbering Plan Billing and Collection Agent, the National Exchange Carrier Association, Inc. (NECA) for the Telecommunications Relay Services Fund, and the Universal Service Administrative Company (USAC) for the federal Universal Service Fund (collectively referred to as the

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<sup>2</sup> *Joint Submission of Program Administrators Regarding Consolidated Data Collection Procedures and Cost Allocation Methodology*, CC Docket No. 98-171 (October 12, 1999) (*Joint Submission*)

<sup>3</sup> 1998 Biennial Regulatory Review Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Services, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms, *Order* in CC Docket No. 98-171, DA 00-214 (February 3, 2000).

<sup>4</sup> *Id.* at ¶ 10.

program administrators), jointly propose a procedural framework for handling of the consolidated worksheet for the period of time requested by the Commission's Order. The DCA will perform the responsibilities consistent with the procedures agreed upon by the program administrators in their October 1999 *Joint Submission*, and utilized by NECA for the April 1, 2000 consolidated worksheet.

### **CONSOLIDATED WORKSHEET DATA COLLECTION AGENT PROPOSAL**

The program administrators propose that the Commission designate USAC as the entity having responsibility for the consolidated worksheet data collection. USAC intends to extend its current agreement with NECA to perform the revenue data collection through December 2002.<sup>5</sup>

Long-term responsibility for oversight and selection of a data collection agent to perform the functions associated with the FCC Form 499A and 499S revenue data collections is of critical importance to each of the program administrators. Each entity shares the need for receiving the highest quality data at a reasonable cost, since each party uses the results of the data collection to bill its respective contributor base for funding its program and is accountable for the costs associated with the work performed on its behalf.

USAC believes it is extremely important for it to have oversight of the process because of the size of the fund it administers, and its unique position of having a Board of Directors with representation from a cross section of the industry, state commissions,

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<sup>5</sup> USAC and NECA have reached an agreement in principle for NECA to continue to perform this work under the terms of their existing contract, and plan to finalize the extension shortly. USAC plans to competitively bid all of its administrative functions that are currently outsourced, and would delay putting

consumer advocates, and other public interest representatives. NECA has the ability to perform these functions as it has done so for TRS, its NBANC subsidiary, and under contract with USAC. In addition, both NeuStar and NECA's NBANC subsidiary are currently operating under "fixed-price" contracts for the funding of their respective programs that expire prior to the April 2003 consolidated worksheet data collection.

The Commission is currently reviewing the possibility of establishing an electronic filing mechanism for the FCC Form 499. This and other potential changes to the process could impact the ability to create a request for proposals and to evaluate potential responses at the current time. Therefore, it is reasonable for USAC to extend its current agreement with NECA through 2002.

Before conclusion of the 2002 data collections, the requirements for the data collection agent should be finalized, and experience gathered regarding cost and level of expertise required in performing the necessary work functions. At that point in time, USAC, as the entity responsible for the data collection agent, would be free to seek competitive bids for operation of the process.<sup>6</sup>

Under this proposal the data collection process benefits from having oversight rest with USAC, whose Board of Directors represents a cross section of the industry participants that contribute to each of the programs. At the same time, the process benefits from the experience gained by NECA in processing revenue information since the initial TRS Form 431 collection in 1993. Both NBANC and NeuStar are assured that

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this function out to bid for a January 2003 commencement in order to facilitate a cost effective and balanced solution to the appointment of a single data collection agent.

<sup>6</sup> USAC plans to seek the input and expertise of NBANC, NECA and NeuStar throughout the competitive process and would work with NeuStar and NBANC to complete the process in sufficient time for them to incorporate any modifications in their respective costs into their own future bids/contracts.

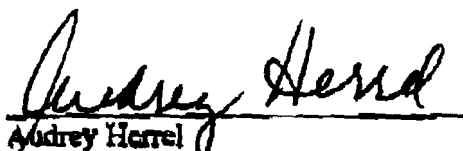
they will receive high quality data within the fixed budgets that they currently operate under for the remainder of their contracts.

The program administrators believe that the proposal included herein meets the criteria established in the Commission's February 3, 2000 Order, (i.e., takes into consideration the practical experiences of the April 1, 2000 filing and demonstrates that it will provide not only low cost overall, but ease of filing for contributors and a high degree of effectiveness in compiling, validating, and distributing the contributor data).

Respectfully submitted,



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